

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN – SOUTHERN DIVISION**

TIFFANY VOSBURG,

Plaintiff,

v.

TRAUNER, COHEN & THOMAS, L.L.P.,  
MANN BRACKEN, LLC, COLLECTCORP  
CORPORATION, and BANK OF AMERICA,

Defendants.

No. 06 CV 15734

Judge Whalen, R. Steven

**BANK OF AMERICA'S MOTION TO STRIKE ELECTRONIC IMAGE AND FOR  
LEAVE TO FILE A REDACTED IMAGE**

Defendant, Bank of America ("Bank of America"), by its attorneys, hereby moves for an order to strike the electronic version of Exhibit A to its counterclaim and for leave to file a redacted version of the exhibit. In support of this motion, defendant states as follows:

1. On March 26, 2007, Bank of America filed its answer, affirmative defenses and counterclaim.
2. Exhibit A to Bank of America's counterclaim contained personal information such as plaintiff's social security number and maiden name. The filing of that information was done inadvertently.
3. Bank of America requests that the electronic version of Exhibit A to its counterclaim be stricken and not published electronically and that it be given leave to file a redacted version.

WHEREFORE, Defendant, Bank of America respectfully requests this Court grant its motion and that the electronic version of Exhibit A to its counterclaim be

stricken and not published electronically and that it be given leave to file a redacted version.

Respectfully submitted,

BANK OF AMERICA

By: \s\ Lawrence M. Benjamin  
One of Its Attorneys

Lawrence M. Benjamin (#6196417)  
NEAL, GERBER & EISENBERG LLP  
Two North LaSalle Street  
Suite 2200  
Chicago, IL 60602-3801  
(312) 269-8000

Dated: March 26, 2007

**CERTIFICATE OF SERVICE**

Lawrence M. Benjamin, an attorney, states that he served a copy of **Bank of America's Motion to Strike Electronic Image and For Leave to File a Redacted Image** upon:

Adam G. Taub, Esq.  
Lyngklip & Taub  
24500 Northwestern Highway  
Suite 206  
Southfield, MI 48075

Steven A. Siman, Esq.  
3250 West Big Beaver Road  
Suite 344  
Troy, MI 48084

by electronic filing using the CM/ECF system which sent notification of such filing on the 26<sup>th</sup> day of March, 2007.

\_\_\_\_\_/s/ Lawrence M. Benjamin